

1 JOHN S. LEONARDO
2 United States Attorney
3 District of Arizona
4 HEATHER H. BELT
5 Assistant U.S. Attorney
6 Arizona State Bar No. 023099
7 Two Renaissance Square
8 40 N. Central Ave., Suite 1200
9 Phoenix, Arizona 85004
10 Telephone: 602-514-7500
11 Email: heather.belt@usdoj.gov
12 Attorneys for Plaintiff

13
14
15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE DISTRICT OF ARIZONA

17 United States of America,
18 Plaintiff,
19 vs.
20 Richard Larry Self,
21 Defendant.

22 No. CV 13-8199-PCT-DGC
23 CR 10-8036-PCT-DGC

24
25
26
27
28 **UNITED STATES MOTION TO
EXTEND TIME TO RESPOND TO
DEFENDANT'S MOTION UNDER 28
U.S.C. § 2255**

1 The United States of America, by its undersigned counsel, respectfully requests an
2 additional 60 days to respond to the defendant's *pro se* Motion under 28 U.S.C. § 2255 to
3 Vacate, Set Aside, or Correct Sentence by a Person in Federal Custody. The Court's
4 Order calling for an answer to the motion was received by the United States, via ECF on
5 November 4, 2013. Therefore, the United States' response is due on or about January 3,
6 2014.

7 The defendant has raised eight grounds of relief in his motion, many of which
8 include additional sub-issues to be addressed. The United States' response to these issues
9 requires a review of all of the trial transcripts, the appellate court record, as well as
10 additional legal research. In November, undersigned counsel prepared and then tried
11 *United States v. Brigido Luna-Zapien*, CR 12-0583-TUC-DCB. Due to that trial and
12 undersigned counsel's current schedule (which includes writing a response to an appeal
13 in *United States v. Israel Paramo-Villasana*, CR 11-3496-TUC-CKJ), additional time is

1 needed to effectively respond to the defendant's motion. For this reason, the United
2 States respectfully requests an additional 60 days from the current due date of January 3,
3 2014, to respond to the defendant's motion.

4 Respectfully submitted this 12th day of December, 2013.

5
6 JOHN S. LEONARDO
7 United States Attorney
District of Arizona

8
9 *s/Heather H. Belt* _____
10 HEATHER H. BELT
Assistant U.S. Attorney

11
12 **CERTIFICATE OF SERVICE**

13 I hereby certify that on December 12, 2013, I electronically transmitted the
14 attached document to the Clerk's Office using the CM/ECF system for filing.

15
16 I hereby certify that on this same date, I served the attached document by U.S.
17 mail, on the following, who may or may not be registered participants of the CM/ECF
18 System:

19
20 Richard Larry Self
30099-008
21 Littleton-Co-Englewood-FCI-SC
Satellite Camp
22 9595 West Quincy Avenue
Littleton, CO 80123

23
24 *s/Erica Lane* _____
U.S. Attorney's Office